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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF DEFENDANT META
PLATFORMS, INC.'S MOTION FOR
SUMMARY JUDGMENT REGARDING
CONSOLIDATED CONSUMER CLASS
ACTION COMPLAINT**

Hearing Date: July 24, 2025

Time: 10:00 a.m.

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration
4 in support of Meta's Motion for Summary Judgment Regarding the Consolidated Consumer
5 Class Action Complaint.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Abridged
7 Expert Declaration of Nicholas Economides, Ph.D. in Support of Renewed Motion to Certify
8 Consumer Class, dated May 24, 2024.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript
10 from Sarah Lamdan's merits deposition held on March 21, 2024.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript
12 from Nicholas Economides's merits deposition held on March 15, 2024.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the transcript
14 from Joseph Farrell's merits deposition held on March 15, 2024.

15 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the Merits
16 Expert Report of Joseph Farrell, dated January 12, 2024.

17 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript
18 from Nicholas Economides's class certification deposition held on September 14, 2023.

19 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the transcript
20 from Maximilian Klein held on May 31, 2023.

21 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the transcript
22 from Sarah Grabert's deposition held on April 24, 2023.

23 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the transcript
24 from Sarah Grabert's deposition held on April 25, 2023.

25 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the
26 transcript from Rachel Banks Kupcho's deposition held on May 22, 2023.

27 12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the Expert
28 Merits Report of Nicholas Economides, dated January 12, 2024.

1 13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of the
2 transcript from Christopher DeWolfe's deposition in the matters *Federal Trade Commission v.*
3 *Meta Platforms, Inc., et al.*, No. 3:22-cv-03590-JEB (D.D.C.) and *Maximilian Klein, et al., v.*
4 *Meta Platforms, Inc.*, No. 3:20-cv-08570-JD (N.D. Cal.), held on March 10, 2023.

5 14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the
6 transcript from Bradley Horowitz's deposition in the matters *Federal Trade Commission v. Meta*
7 *Platforms, Inc., et al.*, No. 3:22-cv-03590-JEB (D.D.C.) and *Maximilian Klein, et al., v. Meta*
8 *Platforms, Inc.*, No. 3:20-cv-08570-JD (N.D. Cal.), held on May 17, 2023.

9 15. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of Consumer
10 Plaintiffs' Second Supplemental Responses and Objections to Interrogatory Nos. 6, 7, and 8 of
11 Defendant Meta Platforms, Inc.'s Second Set of Interrogatories, dated January 18, 2023.

12 16. Attached hereto as Exhibit 15 is a true and correct copy of excerpts of Consumer
13 Plaintiffs' Supplemental Responses and Objections to Interrogatory Nos. 15 and 16, dated
14 February 15, 2023.

15 17. Attached hereto as Exhibit 16 is a true and correct copy of excerpts of Consumer
16 Plaintiffs' Third Supplemental Responses and Objections to Interrogatory No. 1 of Defendant
17 Meta Platforms, Inc.'s First Set of Interrogatories, dated June 23, 2023.

18 18. Attached hereto as Exhibit 17 is a true and correct copy of excerpts of the
19 Declaration of Dr. Nicholas Economides in Support of Consumer Plaintiffs' Motion for Class
20 Certification Errata, dated July 27, 2023.

21 19. Attached hereto as Exhibit 18 is a true and correct copy of excerpts of Consumer
22 Plaintiffs' Responses and Objections to Defendant Meta Platforms, Inc.'s Fourth Set of
23 Interrogatories, dated March 24, 2023.

24
25 I declare that the foregoing is true and correct under penalty of perjury.

26 Executed on this 28th day of April, 2025, in New York, New York.

27 By: /s/ David Z. Gringer

28 David Z. Gringer

SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta